

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Case No. 13-53846

CITY OF DETROIT, MICHIGAN

In Proceedings Under
Chapter 9

Debtor.

Hon. Steven W. Rhodes

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**DISCLOSURE OF REBUTTAL WITNESS
OF AMBAC ASSURANCE CORPORATION**

Ambac Assurance Corporation (“Ambac”), a creditor and/or party in interest in the above-captioned case, in accordance with this Court’s August 29, 2013 Order [Dkt. No. 684] Regarding Debtor’s Motion to Assume Lease or Executory Contract [Dkt. No. 17, corrected by Dkt. No. 157] (the “Motion”), hereby discloses that it intends to present Gary Greendale as a rebuttal witness at the hearing on the Motion currently scheduled for September 23 and 24, 2013 in support of Ambac’s objection to the Motion. Mr. Greendale intends to testify as to means by which the City could have maintained adequate liquidity in lieu of entering into the Forbearance Agreement. Additionally, Ambac will offer Mr. Greendale’s *curriculum vitae* as an exhibit to support Mr. Greendale’s testimony, which will be provided to the City as soon as practicable.

Ambac reserves the right to rely on the exhibits listed in the Debtor's List of Exhibits and Witnesses [Dkt. No. 345] and any exhibits listed by any other objecting party. By reserving this right, Ambac does not waive any objections on relevance or other grounds.

Respectfully Submitted,

ARENT FOX LLP

Dated: September 5, 2013

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